

To: Naranjo, Eugenia[Naranjo.Eugenia@epa.gov]
Cc: Clifford Firstenberg[cfirstenberg@tierrasolutionsinc.com]
From: Carlie Thompson
Sent: Thur 11/17/2016 6:49:31 PM
Subject: RE: Comments on Tierra's September 2016 Schedule for Newark Bay RI/FS

Eugenia,

Please see our responses below. When the schedule is updated, the following additional tasks will also be revised: 17, 18, 19, 20, 21, 29, 30, 36, 37, 44, 53, 62, 63, 77, 83, and 92.

Thanks,

Carlie

From: Naranjo, Eugenia [mailto:Naranjo.Eugenia@epa.gov]
Sent: Tuesday, November 15, 2016 1:23 PM
To: Clifford Firstenberg <cfirstenberg@tierrasolutionsinc.com>
Cc: Carlie Thompson <cthompson@tierrasolutionsinc.com>
Subject: Comments on Tierra's September 2016 Schedule for Newark Bay RI/FS

Cliff,

As I mentioned in my letter dated 11/14/16 , we are working on updating the modeling schedule. I expect to provide a model schedule to Tierra in December. However, in the meantime, Tierra should update the RI/FS schedule. Please include the comments below in your updated schedule and let me know if you have any questions. Thanks,

1. General comment. Please remove question marks from the task duration column of schedule. Add notes if needed to describe uncertainty in estimated durations.

[Carlie Thompson] Question marks will be removed from the task duration column and notes added, if needed, to describe uncertainty in the estimated durations.

2. Lines 89 and 98 (and general comment). Minimum EPA back check and document approval duration should be increased to 1 week.

[Carlie Thompson] The durations for these tasks will be increased to 1 week. The schedule was reviewed and there were no other instances with USEPA review durations less than 1 week.

3. Line 113. Please add milestone for submittal of Draft RAGS Part A & D Exposure Parameter Tables.

[Carlie Thompson] A milestone will be added for the submittal.

4. Task 137 is titled “CSO/SWO”; however, the “SWO” is dropped from subsequent tasks. Does Tierra plan to sample storm water discharges to NBSA?

[Carlie Thompson] “SWO” was not used in subsequent task names in order to shorten the name of the task. Whether storm water discharges will be sampled would be determined during the CSO/SWO recon work. “SWO” will be added to the task names to avoid any confusion.

5. Line 145. Please begin the ‘CSO Recon – Office Work’ task immediately after receiving EPA’s comments on the Draft CSO Recon WP (7 March 2017) or earlier (e.g., concurrent with development of the Draft Recon WP), rather than starting after the approval of the CSO Recon WP.

[Carlie Thompson] The CSO/SWO Recon – Office Work is currently scheduled to start after USEPA approval of the CSO/SWO Recon Work Plan so that the work conducted meets everyone’s expectations. If the work started earlier as suggested, there’s a chance it would need to be redone or redirected based on the WP. Also, moving the start date earlier does not advance the overall schedule so we would prefer to keep the task where it is.

6. Task 154 appears to be out of order with Tasks 155 through 166. Please revise or clarify.

[Carlie Thompson] Task 154 (Agreement on Passaic River CSO Phase II Sampling Methodology) is no longer relevant since the Passaic River CSO program is not continuing. This task will be removed from the schedule.

7. Line 208/209. These appear to be duplicate lines – please check and delete line 208.

[Carlie Thompson] These are duplicate tasks and line 208 will be deleted.

9. Task 238. The schedule estimates 10 weeks to prepare Chapter 2 – Investigations. Given that Tierra will have already prepared field reports for investigations conducted to date and those documents will have been approved by EPA, this task could be accomplished in 4 weeks instead.

[Carlie Thompson] After reviewing, we agree the task duration could be shorter but would prefer to change the duration to 6 weeks. This would allow sufficient time for preparation and internal reviews prior to submittal.